

ECF CASE
JUDGE BERMAN

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

J & J SPORTS PRODUCTIONS, INC., as
Broadcast Licensee of the **May 5, 2007**
DeLaHoya/Mayweather Program,

Plaintiff,

- against -

ANGEL HEREDIA, Individually, and as officer,
director, shareholder and/or principal of 1559 ST.
NICHOLAS CORP. d/b/a LA POTENCIA a/k/a LA
POTENCIA RESTAURANTE,

and

1559 ST. NICHOLAS CORP. d/b/a LA POTENCIA
a/k/a LA POTENCIA RESTAURANTE,
Defendants.

MOTION FOR CONTINUANCE

Civil Action No.07-CV-8042-RMB-GWG
HON. RICHARD M. BERMAN

Come now plaintiff, J & J SPORTS PRODUCTIONS, INC., and moves this Court for an
Order of Continuance to adjourn the Conference from November 1, 2007 at 9:15 a.m. in order to
give plaintiff sufficient time to complete service of process on the defendants ANGEL HEREDIA.

Defendant 1559 ST. NICHOLAS CORP. d/b/a LA POTENCIA a/k/a LA POTENCIA
RESTAURANTE was served on September 28, 2007 via the Secretary of State and said Defendant
has not answered nor have they requested an extension of time to answer. Plaintiff has requested
Clerk's Entry of Default and upon receipt of Clerk's Certificate, will file a Motion for Default
Judgment.

Attached hereto is a proposed order for the Court setting forth the proposed relief requested
herein.

Dated: October 26, 2007
Ellenville, NY, 12428

/s/ Julie Cohen Lonstein
JULIE COHEN LONSTEIN, ESQ.
Attorney for Plaintiff
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CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing document was served on today's date, on the following:

Angel Heredia
2061 Story Ave.
Bronx, NY 10472

1559 St. Nicholas Inc.
1559 St. Nicholas Avenue
New York, NY 10040

By: Julie Cohen Lonstein
Julie Cohen Lonstein, Esq.

